

April 19, 2024

Minnesota Pollution Control Agency
c/o Miles Bergeson
520 Lafayette Road
St. Paul, MN 55155

**Re: POET Biorefining – Lake Crystal LLC
Comments on Proposed Permit Number 01300099-106**

Dear Mr. Bergeson:

POET Biorefining – Lake Crystal LLC (POET) submits the following comment on the Proposed Air Emission Permit No. 01300099-106 that was placed on public notice on April 3, 2024.

Section 7. Compliance Schedule

7.1.1 Hammermill #1: The Permittee shall increase the stack height of the Hammermill #1 stack(s) to at least 30 feet (9.14 m) above base elevation, due before 180 calendar days after Permit Issuance Date. [Corrective Action, Minn. R. 7007.0800, subp. 2(A) & (B), Minn. R. 7009.0020-7009.0090, Minn. Stat. 116.07, subd. 4a(a)]

7.2.1 Hammermill #2: The Permittee shall increase the stack height of the Hammermill #2 stack(s) to at least 30 feet (9.14 m) above base elevation, due before 180 calendar days after Permit Issuance Date. [Corrective Action, Minn. R. 7007.0800, subp. 2(A) & (B), Minn. R. 7009.0020-7009.0090, Minn. Stat. 116.07, subd. 4a(a)]

7.3.1 Hammermill #3: The Permittee shall increase the stack height of the Hammermill #3 stack(s) to at least 30 feet (9.14 m) above base elevation, due before 180 calendar days after Permit Issuance Date. [Corrective Action, Minn. R. 7007.0800, subp. 2(A) & (B), Minn. R. 7009.0020-7009.0090, Minn. Stat. 116.07, subd. 4a(a)]

7.4.1 Hammermill #4: The Permittee shall increase the stack height of the Hammermill #4 stack(s) to at least 30 feet (9.14 m) above base elevation, due before 180 calendar days after Permit Issuance Date. [Corrective Action, Minn. R. 7007.0800, subp. 2(A) & (B), Minn. R. 7009.0020-7009.0090, Minn. Stat. 116.07, subd. 4a(a)]

Comment: POET has already taken steps towards preparing the design and drawings for extending the hammermill stack heights; however, finalizing the design, sourcing materials, and the construction activities are expected to take longer than the proposed 180 days. POET requests that MPCA extend the deadline in draft permit sections 7.1.1, 7.2.1, 7.3.1, and 7.4.1 from 180 calendar days to 300 calendar days to allow for a more achievable construction schedule.

If you have questions regarding this comment, please contact me at 605-965-2315 or Shelby.Wrage@poet.com.

Sincerely,

A handwritten signature in cursive script that reads "Shelby Wrage".

Shelby Wrage
Environmental Engineer II
POET Biorefining

Cc: Kristopher Friday, POET Biorefining – Lake Crystal LLC EH&S Specialist
Gina Greenleaf, Barr Engineering Co.